

# **EXHIBIT 1**

# Request for Return

Hague Convention of 25 October 1980 on the Civil Aspects of International Child Abduction

REQUESTING CENTRAL AUTHORITY OR APPLICANT

REQUESTED AUTHORITY

Concerns the following child:

Timothy Adam Lorenz

who will attain the age of 16 on:

10 June 2025

Note: The following particulars should be completed insofar as possible.

## I. IDENTITY OF THE CHILD AND ITS PARENTS

### 1. Child

name and first names	
Lorenz, Timothy Adam	
sex	female <input type="checkbox"/> male <input checked="" type="checkbox"/>
date and place of birth	
10 June 2009, Southfield, MI, USA	
nationality	
German, US American	
habitual residence before removal or retention	
97493 Bergtheinfeld, Germany	
passport or identity card No, if any	
E 4516026 (German) 566545175 (USA)	
description and photo, if possible (see annexes)	
4'9 feet, blue eyes, dark blonde hair, mole next to lip on left side of face	

### 2. Parents

#### 2.1 Mother

name and first names	
Lorenz, Cornelia Stefanie	
date and place of birth	
04. April 1980, 83278 Traunstein, Germany	
nationality	
German, US American	
occupation	
Foreign Study Program Coordinator	
habitual residence	
97493 Bergtheinfeld, Germany	
passport or identity card No, if any	
CGL2K4C1J (German), 494946838 (USA)	

# Request for Return

Hague Convention of 25 October 1980 on the Civil Aspects of International Child Abduction

REQUESTING CENTRAL AUTHORITY OR APPLICANT

REQUESTED AUTHORITY

Concerns the following child:

Noah Benjamin Lorenz

who will attain the age of 16 on:

11 January 2027

Note: The following particulars should be completed insofar as possible.

## I. IDENTITY OF THE CHILD AND ITS PARENTS

### 1. Child

name and first names	Lorenz, Noah Benjamin		
sex	female <input type="checkbox"/>	male <input checked="" type="checkbox"/>	
date and place of birth	11 January 2011, Southfield, MI, USA		
nationality	German, US American		
habitual residence before removal or retention	97493 Bergtheinfeld, Germany		
passport or identity card No, if any	E 5172879 (German), 545668589 (US American)		
description and photo, if possible (see annexes)	4'5 feet, brown eyes, dark blonde hair, wears glasses		

### 2. Parents

#### 2.1 Mother

name and first names	Lorenz, Cornelia Stefanie		
date and place of birth	04. April 1980, 83278 Traunstein, Germany		
nationality	German, US American		
occupation	Foreign Study Program Coordinator		
habitual residence	97493 Bergtheinfeld, Germany		
passport or identity card No, if any	CGL2K4C1J (German), 494946838 (USA)		

name and first names	Lorenz, Benjamin Zachary
date and place of birth	26 June 1974, Wyandotte, MI, USA
nationality	US American
occupation	Engineer
habitual residence	97493 Bergheinfeld, Germany
passport or identity card No, if any	471046031 (Passport valid until 15 July 2020), new passport number not known

2.3 Date and place of marriage

11 August 2000, 83278 Traunstein, Germany
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**II. REQUESTING INDIVIDUAL OR INSTITUTION**

3. (who actually exercised custody before the removal or retention)

name and first names	Lorenz, Cornelia Stefanie
nationality of individual applicant	German, US American
occupation of individual applicant	Foreign Study Program Coordinator
address	Balthasar-Neumann-Strasse 46, 97493 Bergheinfeld, Germany
passport or identity card No, if any	CGL2K4C1J (German), 494946838 (USA)
relation to the child	Mother
name and address of legal adviser, if any	Peter Pascual, Hadergasse 11, 97421 Schweinfurt, Germany

**III. PLACE WHERE THE CHILD IS THOUGHT TO BE**

4.1 Information concerning the person alleged to have removed or retained the child

name and first names	Lorenz, Benjamin Zachary
date and place of birth, if known	26 June 1974, Wyandotte, MI, USA
nationality, if known	US American
occupation	Engineer
last known address	9335 Caprice Drive, Plymouth, MI 48170
passport or identity card No, if any	471046031 (Passport valid until 15 July 2020), new passport number not known
description and photo, if possible (see annexes)	5'7 feet, 155 lbs, brown hair, wears glasses, hazel eyes

9335 Caprice Drive, Plymouth, MI 48170, USA

4.3 Other persons who might be able to supply additional information relating to the whereabouts of the child

Walter and Susan Lorenz  
5463 Daniel Drive  
Brighton, MI 48114  
Phone: 001-810-360-5052

#### **IV. TIME, PLACE, DATE AND CIRCUMSTANCES OF THE WRONGFUL REMOVAL OR RETENTION**

The petitioner (mother) consented that the father can travel with the child to the USA for summer vacation to visit relatives in Michigan and Tennessee from July 21 to September 5, 2020 under the condition that the father and child would return on September 5, 2020 as the habitual residence is in Germany and the child is obligated under German law to attend school. On September 5, 2020 the father and child did not return back to Germany and decided to keep the child in the US and register the child for school in Michigan against the will of the mother.

Prior to travelling to the United States, the mother prepared a consent form stating the consent for travel which was given to the father. However, the father intentionally edited the wording, in a way that would not oblige him to return on September 5, 2020, and presented the letter to the mother not pointing out the changes in the letter, hence knowingly deceiving the mother. Both, mother and father signed the edited letter.

The mother never gave consent or would have given consent to the father to stay in the United States with the child longer than September 5, 2020.

#### **V. FACTUAL OR LEGAL GROUNDS JUSTIFYING THE REQUEST**

1. Timothy Lorenz is a minor under the age of 16
2. Timothy Lorenz's habitual of residence was Bergsrheinfeld, Germany prior to wrongful retention
3. The wrongful retention was in breach of custody rights under German law as both parents share custody of the child
4. The petitioner actually was exercising custody rights at the time of wrongful retention
5. Both countries, Germany and the United States of America, are signatories of the Hague Convention

#### **VI. CIVIL PROCEEDINGS IN PROGRESS**



**VII. CHILD IS TO BE RETURNED TO**

a)

name and first names
Lorenz, Cornelia Stefanie
date and place of birth
04 April 1980, 83278 Traunstein, Germany
address
Balthasar-Neumann-Strasse 46, 97493 Bergtheinfeld, Germany
telephone number
+49 174 9675700

b) proposed arrangements for return of the child

Mother can pickup child in the USA and return with child to Germany. Mother is ready to appear in court to testify.
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**VIII. OTHER REMARKS**

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**IX. LIST OF DOCUMENTS ATTACHED<sup>1)</sup>**

<ol style="list-style-type: none"><li>1. Residence registration letter Bergtheinfeld</li><li>2. Birth certificate (German &amp; US American)</li><li>3. Authorization</li><li>4. 2018 Legal Assistance Request Form</li><li>5. USA Authorization to release case information form</li><li>6. Voluntary return letter acknowledgement</li><li>7. Color picture of child and father</li><li>8. Passport (German &amp; US American)</li><li>9. Marriage certificate</li><li>10. Letter of consent from mother 15 July 2020, edited letter of consent from father signed 17 July 2020</li></ol>
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Date: 09/16/2020

Place: Bergtheinfeld



Signature and/or stamp of the requesting Central Authority or applicant

<sup>1)</sup> e. g. Certified copy of the relevant decision or agreement concerning custody or access; certificate or affidavit as to the applicable law; information relating to the social background of the child; authorisation empowering the Central Authority to act on behalf of applicant.